

STATEMENT OF BASIS (AI No. 149702)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0125156 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: St. Vincent Seafood Co., Inc.
105 East 18th St.
Larose, LA 70373

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: April 7, 2010

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: N/A
LPDES permit expiration date: N/A

C. Date Application Received: September 25, 2009. Additional information was received April 6, 2010.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - shrimp dock facility

Shrimp are unloaded from boats into the holding tanks, and loaded on trucks for distribution.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II (BPJ points to 0 as per administrative decision)
3. Wastewater Type: II
4. SIC code: 2092

C. LOCATION - 24189 Hwy. 1 in Golden Meadow, Lafourche Parish
Latitude 29°15'28", Longitude 90°12'51"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dock washdown water
Treatment: none
Location: at the point of discharge from the dock
Flow: intermittent
Discharge Route: Bayou Lafourche

Outfall 002

Discharge Type: shrimp unloading tank wastewater
Treatment: none
Location: at the point of discharge from the tank
Flow: 500 gpd
Discharge Route: Bayou Lafourche

Outfall 003

Discharge Type: treated sanitary wastewater
Treatment: mechanical treatment plant with aeration and chlorination
Location: at the point of discharge from the sanitary treatment system
Flow: 120 gpd
Discharge Route: Bayou Lafourche

4. RECEIVING WATERS

STREAM - Bayou Lafourche

BASIN AND SEGMENT - Barataria Basin, Segment 020403

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation

5. TMDL STATUS

Subsegment 020403, Bayou Lafourche - Yankee Canal and saltwater barrier to Gulf of Mexico, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

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6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

An inspection was conducted August 22, 2007. EDMS document 36417637.

B. DMR Review/Excursions

No DMR data available for review.

7. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020403 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated January 5, 2010 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

8. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

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10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

11. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2092 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility. (see Narrative Requirements for the AI)

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Rationale for St. Vincent Seafood Co., Inc.

1. Outfall 001 dock washdown water (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow	Report: Report	BPJ, *
BOD ₅	--: Report	BPJ, *
TSS	--: Report	BPJ, *
Oil & Grease	--: Report	BPJ, *
pH	6.0 su to 9.0 su	BPJ, *

Treatment: none

Monitoring Frequency: Once per quarter by grab sample. BPJ based on existing permits for similar outfalls.

Limits Justification: Flow reporting is in accordance with LAC 33:IX.2707.I.2.b. The Canned and Preserved Seafood Processing ELGs (40 CFR 408) do not apply to the effluent at this outfall. Report only requirements for BOD, TSS and Oil & Grease, and pH limits of 6.0 to 9.0 su have been placed in the permit based on BPJ and existing permits for similar outfalls.

2. Outfall 002 shrimp tank unloading wastewater (estimated flow is 500 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow	Report: Report	BPJ, *
BOD ₅	--: Report	BPJ, *
TSS	--: Report	BPJ, *
Oil & Grease	--: Report	BPJ, *
pH	6.0 su to 9.0 su	BPJ, *

Treatment: none

Monitoring Frequency: Once per quarter by grab sample. BPJ based on existing permits for similar outfalls.

Limits Justification: Flow reporting is in accordance with LAC 33:IX.2707.I.2.b. The Canned and Preserved Seafood Processing ELGs (40 CFR 408) do not apply to the effluent at this outfall. Report only requirements for BOD, TSS and Oil & Grease, and pH limits of 6.0 to 9.0 su have been placed in the permit based on BPJ and existing permits for similar outfalls.

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3. Outfall 003, the discharge of treated sanitary wastewater (estimated flow is 120 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	LAC33.IX.2707.I.1.b
BOD ₅	30:45	See limits justification (1), (2) below
TSS	30:45	See limits justification (1), (2) below
Fecal Coliform	14:43	See limits justification (1), (2) below
pH (s.u.)	6.0:9.0 (min:max)	See limits justification (2) below

Treatment: mechanical treatment plant with aeration and chlorination

Monitoring Frequency: All parameters shall be monitored semiannually in accordance with the current permitting practices for similar outfalls.

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2363.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration. Fecal Coliform limits have been set as per LAC 33:IX.1113.C.5.d.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.